EXHIBIT B

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Re: *Brown, et al. v. Google LLC*, Case No. 4:20-cv-03664-YGR-SVK (N.D. Cal.); *Calhoun, et al. v. Google LLC,* Case No. 4:20-cv-05146-YGR-SVK (N.D. Cal.)

Dear Counsel:

We write in response to the *Calhoun* Plaintiffs' February 6, 2022 letter regarding the preservation of ▇ mapping/linking tables. As stated during the February 14, 2022 hearing, these additional questions have no relevance to what the Court has asked Google to demonstrate: "how the information in the [▇▇▇ tables and ▇▇ tables] is contained in or may be derived from other information that Google is preserving." *Brown* Dkt. 830 at 2; *Calhoun* Dkt. 960 at 3. Nevertheless, in the spirit of collaboration, we provide the following answers.

1.   **How will Google be able to re-construct the links between the Biscotti-to-Biscotti identifiers contained in ▇▇▇ if ▇▇▇ is deleted?**

Google's Response: Google is preserving the source code for ▇▇▇ that could potentially be run over the preserved copies of the underlying tables from which the Biscotti linkages in ▇▇▇ are derived to re-generate the ▇▇▇ tables.

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In addition, Google is separately preserving all the tables from which the Biscotti linkages in ▇▇▇▇▇▇▇ are derived. Therefore, custom pipelines could be created to identify Biscotti IDs linked to the same common identifier in the source tables Google is separately preserving, which has been explained in detail in Google's January 31, 2022 letter. *See Brown* Dkt. 848-6 at 1-2; *Calhoun* Dkt. 973-6 at 1-2.

2. **For Google Account holders, we understand that Google represented that it is preserving the Biscotti encryption and decryption keys that enable full Gaia-Biscotti linking as they exist in ▇▇▇▇▇▇▇▇▇▇▇▇ logs and data sources. Is this correct?**

   Google's Response: This question has no relevance to the ▇▇▇▇▇▇▇ or ▇▇▇ tables, which are the sole subjects of Google's motion and the January 17, 2023 Order. *Brown* Dkt. 830; *Calhoun* Dkt. 960.

   In any event, to clarify, Google responds as follows: Pursuant to the Court's preservation orders, Google is preserving data sources not at issue in the present motion that encrypt Biscotti IDs in the GAIA data flow. For those sources, Google has undertaken the following steps: "(1) decrypt the data to be preserved at the time of preservation so that Google no longer needs to rely on the "biscotti-joinability-key"; (2) re-encrypt the data in a safe and secured manner using a new key created exclusively for this purpose; and (3) preserve the data and this new encryption key[.]" *Brown* Dkt. 630 at 2; *Calhoun* Dkt. 766 at 9.

3. **Is it Google's position that these Gaia-to-Biscotti linkages are sufficient to identify Google Account holder data across ▇▇▇▇▇▇▇▇▇▇ sources?**

   Google's Response: No, that is not Google's position. As stated previously, Google does not maintain GAIA-to-Biscotti mapping or linking tables. *See Brown* Dkt. 781-9 ¶ 7; *Calhoun* Dkt 897-11 ¶ 7.

4. **To illustrate, is it correct that ▇▇▇▇▇▇▇ maps Biscotti1 to Biscotti2?**

   Biscotti1 — Biscotti2

   Google's Response: It is unclear what Biscottis Plaintiffs are referring to. To clarify, and as explained in Google's January 26, 2023 letter, ▇▇▇▇▇▇ contains Biscotti linkages that are derived from the following mapping/linking tables. *Brown* Dkt. 848-5 at 4; *Calhoun* Dkt. 973-5 at 4; *see also Calhoun* Dkt. 942-5, Trebicka Ex. 1 (GOOG-CALH-00374314) at -354, -355.

Project	Source ID	Target ID
▇▇▇▇	▇▇▇▇▇▇▇▇▇	▇▇▇▇▇▇▇▇

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5.   However, Google is maintaining mappings via Biscotti encryption/decryption keys such that Gaia1=Biscotti1 and Gaia1=Biscotti2?

Google's Response: It is unclear what "Gaia1=Biscotti1" and "Gaia1=Biscotti2" mean. As stated previously, there are no mapping or linking tables that map or link Biscotti to GAIA or vice versa. *See Brown* Dkt. 781-9 ¶ 7; *Calhoun* Dkt 897-11 ¶ 7.

As explained above and in Google's January 26, 2023 letter, Google is separately preserving all the source tables from which the Biscotti linkages in ███████████ are derived, including the ███████████ linking table and the ███████████ linking table. *Brown* Dkt. 848-5 at 4; *Calhoun* Dkt. 973-5 at 4. ███████████████████████ ███████; ███████████████████████████████████. *Calhoun* Dkt. 942-5, Trebicka Ex. 1 (GOOG-CALH-00374314) at -332. Google is also separately preserving a table that maps GAIA to ███████████.

6.   However, it is not necessary to maintain the Biscotti1 to Biscotti2 so long as Google maintains the Gaia1 mappings? The reason for this is that Google can re-create the Biscotti1 to Biscotti2 mapping – rendering separate maintenance of Biscotti1 to Biscotti2 unnecessary? Please confirm.
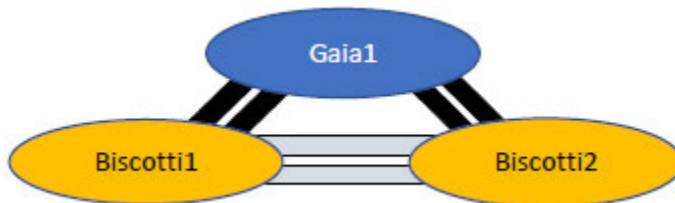
Google's Response: It is unclear what "Gaia1 mappings" mean or why there is a Biscotti1 to Biscotti2 mapping for Google to "re-create." As stated previously, there are no mapping

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or linking tables that map Biscotti to GAIA or vice versa. *See* Brown Dkt. 781-9 ¶ 7; Calhoun Dkt. 897-11 ¶ 7.

As to the Biscotti ID linkages contained in ███████████ , as explained above and in Google's January 26, 2023 letter, Google is separately preserving all the source tables from which the Biscotti linkages in ██████████ are derived, including the ██████████ linking table and the ████████████ linking table, which contain identifiers received from signed-in browsing activity. That renders separate preservation of the Biscotti linkages in ██████████ unnecessary. Moreover, as explained in the Joint Status Report and at the February 14, 2023 hearing, Plaintiffs would not need any of the Biscotti linkages in ██████████ to read the preserved data in any event. *See Brown* Dkt. 848-3 at 2; *Calhoun* Dkt. 973-3 at 2.

7. **For Google Account holders, are the Gaia-Biscotti linkages that make the Biscotti-Biscotti linkages in ██████████ unnecessary as comprehensive as the Biscotti-Biscotti linkages in ██████████ ? If yes, please state as much. If no, please explain the ways in which they are not as comprehensive.**

   Google's Response: It is unclear what "Gaia-Biscotti linkages" Plaintiffs are referring to, or what "as comprehensive" means in this context. Further, the premise of your question appears to be that ██████████ relies on a GAIA-Biscotti linkage, which is incorrect, as Google does not maintain a mapping or linking of Biscotti to GAIA or vice versa. *See Brown* Dkt. 781-9 ¶ 7; *Calhoun* Dkt 897-11 ¶ 7.

8. **For non-Google Account holders, can device identifiers be the intermediate identifiers that can create the transitive association between Biscotti1 to Biscotti2?**

   Google's Response: Device IDs (IDFA or AdID) can only be the "intermediate identifier" that links two Biscottis received through App activities, and not for the data flow at issue in either the *Brown* case or the *Calhoun* case. *Brown* Dkt. 395-2 (TAC) ¶ 192; *Calhoun* Dkt. 163 (FAC) ¶ 262.

9. **What other intermediate identifiers can create the transitive association between Biscotti1 to Biscotti2? And where are those intermediate identifier mappings stored and for how long?**

   Google's Response: As explained above and in Google's January 26, 2023 letter, all the Biscotti linkages in ██████████ are derived from mappings or linkages between different kinds of Biscotti IDs (e.g. ██████████████ , ███████████████████) and other identifiers as explained in prior filings (including IDFA, AdID, ██████████████ , █████████) contained in ███ underlying tables which Google is separately preserving. *Brown* Dkt. 848-5 at 4; *Calhoun* Dkt. 973-5 at 4.

10. **How long are the ██████████ mappings preserved, both today and during the proposed Class Period?**

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Google's Response: As explained in Google's January 30, 2023 letter, ██████████ is configured to keep only the Biscotti linkages generated within the past ██████ or fewer. *Brown* Dkt. 848-7 at 3; *Calhoun* Dkt. 973-7 at 3.

11.   **Do the at-issue ██████████ and ████████ mapping tables contain mappings in addition to Biscotti-to-Biscotti?**

    a.   **Is Zwieback present in ██████████?**

    b.   **Is Gaia present in ██████████?**

    c.   **Are URLs (full or shortened) present in ██████████?**

    d.   **Are there any Sync status signals in the tables?**

    Google's Response:

    a.   No. As explained in Google's January 26, 2023 letter, the ██████████ tables contain Biscotti ID linkages. *Brown* Dkt. 848-5 at 1; *Calhoun* Dkt. 973-5 at 1. They do not contain Zwieback IDs.

    b.   No. As explained in Google's January 26, 2023 letter, the ██████████ tables contain Biscotti ID linkages. *Id.* They do not contain GAIA IDs.

    c.   No. As demonstrated by the sampled data from ██████████ Google included in its January 26, 2023 letter, URLs are not present in ██████████. *Brown* Dkt. 848-5 at 2-3; *Calhoun* Dkt. 973-5 at 2-3.

    d.   No. The ██████████████ tables and ████████████ tables do not contain any field that may indicate whether Chrome Sync is enabled or disabled, including any field that signals the ██████████ *See Brown* Dkt. 848-7 at 3; *Calhoun* Dkt. 973-7 at 3.

12.   **Are any of these tables being preserved for any other litigation or regulatory review? If so, which ones?**

    Google's Response: This question seeks privileged and otherwise protected information and is completely outside the scope of the demonstration that the Court ordered Google to perform.

13.   **What specifically is uniquely contained in the ██████████ mapping tables (but not in other preserved data sources) that would not be preserved if the tables are not preserved?**

    Google's Response: This request goes beyond the scope of the demonstration that the Court ordered Google to perform. *Brown* Dkt. 848-4; *Calhoun* Dkt. 973-4 (1/10/23 *Brown*

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Hrg. Tr.) at 23:9-10 ("I'm not going to, again, reorder or reopen discovery and have a full review of everything in these tables"); *Brown* Dkt. 848-8; *Calhoun* Dkt. 973-8 (1/10/23 *Calhoun* Hrg. Tr.) at 22:6-8 ("This is not an open it all up and have the Plaintiffs look around and see if there's anything that relates. That is not the process."). As far as the issue in dispute (mapping/liking), Google has already demonstrated that the identifier linkages in the ███████ tables are derived from ██ underlying tables, which Google is separately preserving. *See, e.g. Brown* Dkt. 848-5 at 1-4; *Calhoun* Dkt. 973-5 at 1-4.

14.   **Is Google preserving the derivation programs and encryption/decryption keys for:**

a.   ███████ ;

b.   ███████ ; and

c.   **Other data sources identified in Google's letter?**

Google's Response: As explained in Google's January 30, 2023 letter and at the February 14, 2023 hearing, ███████ is one of the Biscotti IDs linked together in ███████ . After ███████ links multiple Biscotti IDs, it defines one of them as the ███████ Any Biscotti linkage in ███████ , including any linkage between a ███████ and other Biscotti ID/ ███████ is derived from the ██ underlying source tables that Google is separately preserving. *Brown* Dkt. 848-7 at 2; *Calhoun* Dkt. 973-7 at 2.

15.   **How is the ███████ assigned by ███████ to link different Biscottis determined?**

Google's Response: As explained in Google's January 30, 2023 letter and at the February 14, 2023 hearing, ███████ is one of the Biscotti IDs linked together in ███████ . After ███████ links multiple Biscotti IDs, it defines one of them as the ███████ Any Biscotti linkage in ███████ , including any linkage between a ███████ and other Biscotti ID/ ███████ are derived from the ██ underlying source tables that Google is separately preserving. *Brown* Dkt. 848-7 at 2; *Calhoun* Dkt. 973-7 at 2.

16.   **Is the ███████ (say Group1) assigned by ███████ to link the Biscotti IDs persistent? If not, please explain what causes the changes?**
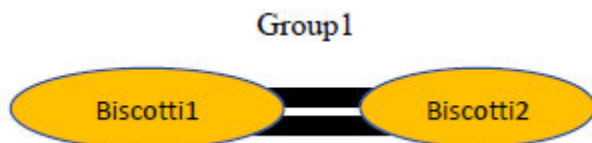
Google's Response: It is unclear what "persistent" means in this context. As explained in Google's January 30, 2023 letter and at the February 14, 2023 hearing, ███████ is one of the Biscotti IDs linked together in ███████ . After ███████ links multiple Biscotti IDs, it defines one of them as the ███████ *Brown*

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Dkt. 848-7 at 2; *Calhoun* Dkt. 973-7 at 2. In the graph Plaintiffs provided, either Biscotti1 or Biscotti2 would be defined as the ███████. ███████████ is configured to keep only the Biscotti linkages generated within the past ██████ or fewer. *Id*. at 3.

17.   **What is the lifetime of a linkage in ███████████?**

Google's Response: As explained in Google's January 30, 2023 letter, ███████████ is configured to keep only the Biscotti linkages generated within the past ███████ or fewer. *Brown* Dkt. 848-7 at 3; *Calhoun* Dkt. 973-7 at 3.

18.   **What, if anything, can cause a linkage in ███████████ to be removed?**

Google's Response: As explained in Google's January 30, 2023 letter, ███████████ is configured to keep only the Biscotti linkages generated within the past ███████ or fewer. *Id*.

19.   **Assuming the linkage (Group1) between the two Biscottis (Biscotti1 and Biscotti2) was removed, if later these two Biscottis are linked together by ███████████, are they assigned the same ██████ of Group1?**

Google's Response: As explained in Google's January 30, 2023 letter and at the February 14, 2023 hearing, ███████ is one of the Biscotti IDs linked together in ███████████. After ███████████ links multiple Biscotti IDs, it defines one of them as the ███████████████████████████ *Id*. at 2. Under Plaintiffs' example, if Biscotti1 and Biscotti2 are linked in ███████████, either Biscotti1 or Biscotti2 would be defined as the ███████████ Because the Biscotti linkages in ███████████ can be derived from the source tables Google is separately preserving, which one of the Biscottis in a linked group was designated in ███████████ as the ███████████ is not relevant for the purposes of preserving the identifier linkages.

<p align="center">*   *   *</p>

Pursuant to the Court's February 14, 2023 Order, the Parties are required to submit additional briefing on Friday, February 24, 2023, "[i]f any of the issues raised in the February 6 Letter remain unresolved." *Brown* Dkt. 861. Accordingly, Google proposes that both the *Brown* and *Calhoun* Plaintiffs identify the issues they consider unresolved and their respective positions by Tuesday, February 21, 2023, so that Google can respond appropriately.

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Sincerely,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

Viola Trebicka

VT